

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

DELAWARE MARKETING PARTNERS,  
LLC, a Delaware limited liability company,

Plaintiff

CA No.: 04-263

v.

JUDGE McLAUGHLIN AND  
MAGISTRATE JUDGE  
SUSAN PARADISE BAXTER

CREDITRON FINANCIAL SERVICES,  
INC, a Pennsylvania corporation, and,  
TELATRON MARKETING GROUP,  
INC., a Pennsylvania corporation,

TRIAL BY JURY DEMANDED

**Electronically Filed**

Defendants

**PROPOSED VOIR DIRE**

AND NOW, comes Delaware Marketing Partners, LLC, by and through its counsel,  
Dickie, McCamey & Chilcote, P.C., and respectfully submits the within proposed jury voir dire  
as follows in accordance with Local Rule 47.1:

**To be posed to the jurors collectively:**

1. All of the questions found in Local Rule 47.1(B), with the exception of question  
number 1 (relating to investigation of payment of accident claims).

**To be posed to the jurors individually:**

1. Those questions found in Local Rule 47.1(C), with the exception of question  
number 8 (relating to the potential jurors' family physicians).

2. If you responded affirmatively to any of the questions set forth in LR 47.1 (B) (2-5), will your knowledge about this case or your knowledge concerning any one of the subject parties, attorneys, or law firms, influence your judgment in this case so that you may not be able to be fair and impartial?

3. What is your date and place of birth?

4. What is the extent of your formal education?

5. Do you have any experience working with the consolidation of debt?

6. Do you have any experience working with the financing or consolidation of student loans?

7. If you or any member of your family has ever been a party to a lawsuit, did you or your family member bring the suit, or were you or your family member being sued? What was the outcome of the case?

8. Do you or any member of your immediate family have any bias for or against either party?

(a) If so, please describe the nature of that bias as it relates to either party.

(b) Will that influence your judgment in this case so that you may not be able to be fair and impartial?

9. Have you or any members of your immediate family ever had a dispute with either party?

10. Is there any reason of any kind that would prevent you from rendering a fair and impartial verdict in this case?

11. This case involves a claim for money damages arising out of a contract between the parties.

- (a) Do you have an opinion or a belief for or against this type of case or the people who file this type of case, or the persons who are sued in this type of case?
- (b) If so, what is that opinion or belief?
- (c) Will that influence your judgment in this case so that you may not be able to be fair and impartial?

12. Have you or a member of your family ever had student loans? If so, please identify the family member, that person's age, relationship to you, and if you or your family member ever lodged any claim or complaint regarding the loan and describe the nature of the claim or complaint.

13. If you or a member of your family have ever had student loans, did you or your family member consolidate the same? If so, please identify the family member, that person's age, relationship to you, and the nature of the consolidation.

14. If you or a member of your family have ever had student loans, did you or your family member repay the debt? If not, is that debt currently outstanding and/or being repaid?

15. Do you have children in college or other post-high school education? If so, does your child have student loans that have been repaid or are currently outstanding?

16. The following persons may be witnesses in this case, and may testify at this trial:

- (a) Harry E. Metcalfe;
- (b) Alan Estes;
- (c) Brian Nelson;
- (d) Alfred Cavotto;
- (e) Joyce Cavotto;
- (f) Katherine Lombardozzi;
- (g) Mark Kisiel;
- (h) Terry Smith;
- (i) Trisha Desanti-Boehm.

Do you know any of the prospective witnesses just named?

17. Have you ever been dismissed or laid off from a job or otherwise involuntarily left employment? If so, when and how long were you out of work?

Respectfully submitted,

DICKIE, McCAMEY & CHILCOTE, P.C.

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